

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KRAFT FOODS GLOBAL, INC., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 11-cv-8808
	)	
v.	)	Hon. Steven C. Seeger
	)	
UNITED EGG PRODUCERS, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

---

**DEFENDANTS' PROPOSED UPDATES TO JURY INSTRUCTIONS**

Defendants Cal-Maine Foods, Inc., Rose Acre Farms, Inc., United Egg Producers, Inc., and United States Egg Marketers, Inc. submit for the Court's consideration the attached proposed changes to the jury instructions that were circulated following the November 8, 2023 jury instructions conference.

The first proposed amendment, attached as Exhibit A, is a new proposed instruction on the use of responses to Requests for Admission. This instruction clarifies for the jury how they are to use Plaintiffs' admissions, that were entered into evidence and read into the record at trial, during deliberations.

The second proposed amendment, attached as Exhibit B, is a modest change adding language to the Omitted Instruction related to "Evidence Limited to Certain Parties." The language in the amended instruction provides an example for the jury of evidence that was admitted against only certain parties and how that type of evidence may be used by the jury during deliberations.

Dated: November 10, 2023

Respectfully Submitted,

/s/ Patrick M. Collins

Patrick M. Collins (pcollins@kslaw.com)

Livia M. Kiser (lkiser@kslaw.com)

Patrick M. Otlewski (potlewski@kslaw.com)

Abigail Hoverman Terry (aterry@kslaw.com)

KING & SPALDING LLP

110 North Wacker Drive, 38th Floor

Chicago, IL 60606

Tel: (312) 995-6333

Lohr Beck (lohr.beck@kslaw.com)

(pro hac vice)

KING & SPALDING LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Tel: (404) 572-2812

Brian E. Robison (brian@brownfoxlaw.com)

(pro hac vice)

BROWN FOX PLLC

6303 Cowboys Way, Suite 450

Frisco, TX 75034

Tel: (972) 707-2809

***Counsel for Defendant Cal-Maine Foods,  
Inc.***

/s/ Robin P. Sumner

Robin P. Sumner

(robin.sumner@troutman.com)

Kaitlin L. Meola

(kaitlin.meola@troutman.com)

TROUTMAN PEPPER HAMILTON  
SANDERS LLP

3000 Two Logan Square, 18th and Arch  
Streets

Philadelphia, PA 19103-2799

Tel: (215) 981-4000

Whitney R. Redding

(whitney.redding@troutman.com)

/s/ Jay L. Levine

Donald M. Barnes

(dbarnes@porterwright.com)

Jay L. Levine

(jlevine@porterwright.com)

PORTER, WRIGHT, MORRIS &  
ARTHUR LLP

2020 K. Street, N.W., Suite 600

Washington, D.C. 20006-1110

Tel: (202) 778-3000

James A. King

(jking@porterwright.com)

Allen T. Carter

TROUTMAN PEPPER HAMILTON  
SANDERS LLP  
Union Trust Building  
501 Grant Street, Suite 300  
Pittsburgh, PA 15219-4429  
Tel: (412) 454-5085

Molly DiRago  
(Molly.DiRago@troutman.com)  
TROUTMAN PEPPER HAMILTON  
SANDERS LLP  
227 West Monroe Street, Suite 3900  
Chicago, IL 60606  
Tel: (312) 759-1923

***Counsel for Defendants United Egg  
Producers, Inc. & United States Egg  
Marketers, Inc.***

(acarter@porterwright.com)  
PORTER, WRIGHT, MORRIS &  
ARTHUR LLP  
41 South High Street, Suite 2900  
Columbus, OH 43215  
Tel: (614) 227-2000

***Counsel for Defendant Rose Acre  
Farms, Inc.***